

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

ATLAS SHIPPING A/S and ATLAS BULK
SHIPPING AS, Danish Corporations,

Bankrupts in Foreign Proceedings

CHAPTER 15

Case No: 09-10314
Jointly Administered

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the Declaration of the Trustee-Petitioner, Lisa Bo Larsen, the Declaration of James F. Sweeney, and the accompanying Memorandum of Law, the undersigned will move this Court on March 25, 2009 at 10:00 a.m. or soon as counsel may be heard before the Honorable Martin Glenn, at the United States Bankruptcy Courthouse of the Southern District of New York, Courtroom 501, One Bowling Green, New York, New York, for an Order pursuant to Chapter 15 of the U.S. Bankruptcy Code to vacate the Rule B maritime attachments and for the turnover of funds subject to attachment, garnishment, or any kind of lien, to the Trustee-Petitioner, Lisa Bo Larsen.

Dated: New York, New York
March 4, 2009

Yours, etc.

NICOLETTI HORNIG & SWEENEY
Attorneys for Trustee-Petitioner

By:

James H. Sweeney (JFS 7745)
88 Pine Street -7th Floor
New York, New York 10005
(212) 220-3830
Our File No.: 00000878JFS

To:

Claurisse Ann Campanale-Orozco
Tisdale Law Offices, LLC
*Attorneys for Dormin Shipping S.A.,
New Era Shipping*
24 West 40th Street
17th Floor
New York , NY 10018
Email: corozco@tisdale-law.com

James A. Saville , Jr.
Hill, Rivkins & Hayden, L.L.P.
Attorneys for Cargill International S.A
45 Broadway
Suite 1500
New York , NY 10006
Email: 'jsaville@hillrivkins.com'

Garth S. Wolfson
*Attorneys for Amanda C. Navigation Company LLC,
Sertio Shipping Co. Ltd.,
Trans Pacific Carriers Co. Ltd*
Mahoney & Keane, LLP
11 Hanover Square
10th Floor
New York , NY
Email: gwolfson@mahoneykeane.com

Thomas Hunt Belknap , Jr
Blank Rome LLP
Attorneys for Allied Maritime Inc.
The Chrysler Building
405 Lexington Avenue
New York , NY 10174
Email: 'tbelknap@BlankRome.com'

Peter Skoufalos
Brown Gavalas & Fromm LLP
Attorneys for Malena Shipping Company
355 Lexington Avenue
New York , NY 10017
Email: pskoufalos@browngavalas.com